

EXHIBIT B

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Co-Lead/Liaison Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

**DECLARATION OF RAMON ROSSI
LOPEZ IN SUPPORT OF SURREPLY IN
OPPOSITION TO DEFENDANTS'
MOTION TO DISQUALIFY THOMAS
KINNEY, M.D. AS AN EXPERT FOR
PLAINTIFFS**

I, Ramon Rossi Lopez, declare under the penalty of perjury under the laws of the United States of America as follows:

1. I am an adult person over eighteen years over eighteen (18) years of age residing in Orange County, California.

2. I am an attorney duly licensed to practice law in the State of California. I am admitted *pro hac vice* in the above captioned matter and I am a partner of Lopez McHugh, LLP and Co-Lead Counsel for *In re Bard IVC Filter Products Liability Litigation*, MDL No. 2641.

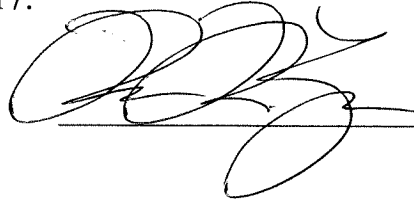
3. In my role as Co-Lead Counsel in this MDL, I have worked with Thomas Kinney, M.D., who is an expert witness for Plaintiffs in this action.

4. I attended Dr. Kinney's deposition in this action on June 17, 2017, and I have received from Dr. Kinney a draft errata sheet for that deposition. The errata sheet is due on July 17, 2017 and is not yet final.

1 5. In his errata sheet, Dr. Kinney noted the following supplementation to his
2 testimony at page 313, lines 2-1 should read: "Richard North did not contact me directly
3 with the individual cases. It was a Bard Staff Member who would get me in contact by
4 phone with a clinician with a specific clinical question."

5 I declare under penalty of perjury that the foregoing is true and correct.

6 EXECUTED this 12th day of July 2017.

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